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WIGGIN AND DANA

May 28, 2004

Counsellors at Law

Julie Donaldson Kohler Hurwitz & Sagarin, LLC 147 North Broad St. Milford, CT 06460

Monte E. Frank Cohen & Wolf, P.C. 158 Deer Hill Avenue Danbury, CT 06810

Re: Woodbridge-Milford Interrogatory Responses

Dear Attorneys Kohler and Frank:

As you are aware, The Connecticut Light and Power Company and The United Illuminating Company ("the Companies") objected to several interrogatories regarding the Companies' environmental experts served upon the Companies by the Town of Woodbridge and the City of Milford ("the Towns"). During a recent conference call between counsel for the Companies and the Towns, it was agreed that the Companies would respond to several questions provided by the Towns in lieu of providing responses to the interrogatories to which the Companies previously objected. The Companies' responses to the Towns questions are attached.

If you have any questions concerning these responses, please do not hesitate to contact me.

Very truly yours,

Bruce L McDermott

cc: Service List

Enclosure

1. Who will be the Companies' witnesses as to environmental matters at the hearings scheduled for June 1-3, 2004? What will be the role of each witness?

The Companies' panel of environmental witnesses will respond to matters relating to the ecological, natural, recreational, historical, archaeological and scenic resource values of the proposed transmission line in Woodbridge and Milford. The panel will be comprised of Louise Mango (Phenix Environmental, Inc.), as well as Jeff Borne (CL&P), Don Biondi (CL&P), Ken Stevens, (Soil Science and Environmental Services, Inc.) and Michael Raber (Raber Associates). The roles and responsibilities of the witnesses on the panel are described in the responses to questions 2 and 3, below.

2. Describe the role each individual had in the preparation of the Siting Council Application.

Raber Associates undertook an assessment of cultural resources in order to identify known or potential archaeological sites within possible project areas, to identify significant historic properties potentially subject to physical project construction effects and to evaluate the potential for indirect adverse visual effects on significant historic properties.

SSES described and delineated wetland and watercourse resources along the existing ROW, as well as along the underground portion of the route. In the spring of 2003 SSES conducted an amphibian breeding survey of the identified wetland areas most likely to provide amphibian breeding habitat.

Ms. Mango was responsible for the preparation of the various environmental sections of the Application and is assisting the Companies in their preparation of applications to the Army Corps of Engineers and the Department of Environmental Protection. She identified the bird species that are known or expected to breed in Connecticut and that may occur along the proposed route. Ms. Mango has also filed pre-filed testimony concerning environmental impacts of the proposed route.

3. What will be the nature of each individual's testimony at next week's hearings?

With respect to the areas discussed above, the experts will be available to answer questions regarding impacts of the project on ecological, natural, recreational, historical, archeological and scenic resource values and mitigation/design efforts, the gathering and evaluation of data, the main environmental resources along the proposed overhead route, the potential environmental impacts of the overhead route and mitigation measures, environmental matters regarding the proposed development of the Beseck Switching Station, and preparation of the Siting Council Application. In preparing the Application, field studies were performed to identify and describe wetlands, watercourses, and amphibian breeding areas. Reconnaissance or studies also were conducted with respect to cultural resources, visual resources, land uses, and noise. The experts will be able to answer questions regarding those studies. The biological field surveys performed by SSES included amphibian studies and field surveys to describe and delineate Connecticut regulated wetlands and watercourses that were conducted in 2002 and 2003. SSES also identified areas where proposed structures could be moved slightly to avoid wetlands and to identify areas where wetlands or watercourses would have to be crossed to provide access during construction or operation of the Project.

4. What will the role of each expert be in the preparation of the D&M Plans?

It is anticipated that Anne Bartosewicz and John Prete will have overall responsibility for the preparation of the D&M Plans, and that Ms. Bartosewicz and Mr. Prete will call upon environmental experts as necessary to complete particular aspects of the D&M Plans.

5. Who will be responsible for the preparation of the environmental permit applications?

Permit applications to the Connecticut Department of Environmental Protection and U.S. Army Corps of Engineer will be prepared by counsel to the Companies, assisted as necessary by Ms. Mango, Mr. Biondi, Mr. Borne, Ms. Shanley, Ms. Giansante, SSES and by other employees or consultants of the Companies.

6. Who will be responsible for compliance with the permit?

The Project will be constructed and operated in accordance with the conditions of the Siting Council certificate and of permits from the ACOE and DEP. The Companies and their construction contractors will be responsible for compliance. As project directors, Anne Bartosewicz and John Prete will have overall responsibility for compliance with permits obtained by the Companies in connection with the Project. Further, as noted in the April 2004 testimony, the Siting Council also will monitor the Companies' compliance with certificate conditions.

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